

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

CHAO HUI ZHENG,
a/k/a "Betty," and
GUO SONG LUO,
a/k/a "Sam,"

Defendants.

-X

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: <u> </u>
DATE FILED: <u> </u> 2008
: 08 Cr.

-X

08CRIM 279

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2001, up to and including in or about August 2006, in the Southern District of New York and elsewhere, CHAO HUI ZHENG, a/k/a "Betty," and GUO SONG LUO, a/k/a "Sam," the defendants, and others known and unknown, unlawfully, willfully, and knowingly, did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 8, United States Code, Section 1325(c).

2. It was a part and an object of the conspiracy that CHAO HUI ZHENG, a/k/a "Betty," and GUO SONG LUO, a/k/a "Sam," the defendants, and others known and unknown, unlawfully, willfully, and knowingly, would and did enter into and cause others to enter into marriages for the purpose of evading the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

JUDGE LYNCH

Overt Acts

3. In furtherance of the conspiracy, and to effect its illegal object therof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about 2004, GUO SONG LUO, a/k/a "Sam," and CHAO HUI ZHENG, a/k/a "Betty," the defendants, spoke in New York, New York, with a co-conspirator not named herein ("CC-1") for the purpose of arranging a fraudulent marriage between a Chinese national ("CC-2") and an United States citizen ("USC-1").

b. On or about November 4, 2004, GUO SONG LUO, the defendant, introduced CC-2 to USC-1 in New York, New York, for the purpose of arranging a fraudulent marriage between CC-2 and USC-1.

c. On or about November 4, 2004, GUO SONG LUO, the defendant, accompanied CC-2 and USC-1 to City Hall in New York, New York.

(Title 18, United States Code, Section 371.)

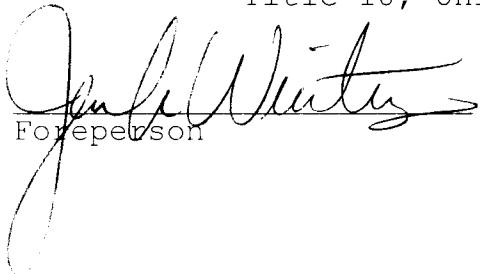
COUNT TWO

The Grand Jury further charges:

4. From at least in or about 2001, up to and including in or about August 2006, in the Southern District of New York and elsewhere, CHAO HUI ZHENG, a/k/a "Betty," and GUO SONG LUO, a/k/a "Sam," the defendants, unlawfully, willfully, and

knowingly did enter into and cause other persons to enter into marriages for the purpose of evading the immigration laws, to wit, CHAO HUI ZHENG and GUO SONG LUO arranged sham marriages between United States citizens and foreign citizens for the purpose of fraudulently obtaining lawful permanent resident status for the foreign citizens.

(Title 8, United States Code, Section 1325(c) and Title 18, United States Code, Section 2.)



Jenifer Winters
Foreperson



Michael J. Garcia
MICHAEL J. GARCIA
United States Attorney

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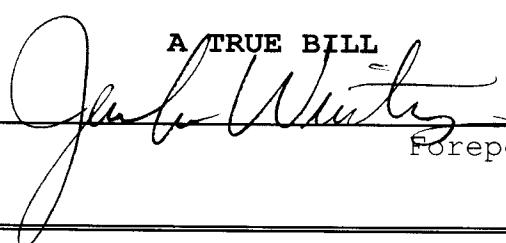
INDICTMENT

08 Cr.

(18 U.S.C. §§ 371 and 2 & 8 U.S.C. §
1325(c).)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL



Foreperson.